



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

JUL 24 2014

REPLY TO THE ATTENTION OF:  
WC-15J

**CERTIFIED MAIL 7009 1680 0000 7678 6317**  
**RETURN RECEIPT REQUESTED**

Mr. David Kitzmiller, Area Manager  
Village of Godfrey  
4725 Brecht Lane  
Godfrey, Illinois 62035

Subject: Wet Weather/Sanitary Sewer System Information Request  
Issued Pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a)  
Docket No. V-W-14-308-22

Dear Mr. Kitzmiller:

Thank you for your timely response to the U.S. Environmental Protection Agency's previous Clean Water Act (CWA), Section 308 Information Request (EPA Docket Number V-W-13-308-19), issued on August 14, 2013. We have reviewed the material you have submitted and have determined that additional information is needed in regards to background for Sanitary Sewer Overflows (SSOs) and Property/Basement Backups that have occurred within the whole Village of Godfrey's sanitary collection system since 2009. In your response to this enclosed Information Request, please make sure to clearly identify in both Questions 9 and 18 whether a SSO or Property/Basement Backup occurs within the portion of the collection system tributary to the Alton Sewage Treatment Plant or occurs within the portion of the collection system tributary to the Godfrey Sewage Treatment Plant.

EPA is authorized under Section 308(a) of the CWA, 33 U.S.C. § 1318(a), to require reports and other information necessary to carry out the purpose of the CWA. Accordingly, pursuant to Section 308(a) of the CWA, you are directed to provide EPA with the information requested in the enclosure.

In accordance with Section V, Paragraph 2 of the Information Request, you must include with your response a statement certifying that all information you submit is true and accurate to the best of your knowledge and belief using the certification language provided in that paragraph. Any questions that do not directly relate to your municipality's sanitary sewer system operations can be addressed with "not applicable" and a brief explanation.



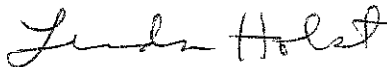
Please exercise care to assure that responses are complete and accurate because Section 309(c)(2) of the CWA, 33 U.S.C. § 1319(c)(2), imposes criminal penalties where false information is knowingly provided to EPA.


You must submit a written response, with the information requested in the enclosure, within 30 days of receipt of this request to:

Water Enforcement and Compliance Assurance Branch (WC-15J)  
U.S. Environmental Protection Agency, Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
Attention: Keith Middleton, Environmental Engineer

Thank you for your cooperation in this matter. Should you have any questions, please contact Keith Middleton of my staff, at (312) 886-6465 or by e-mail at [middleton.keith@epa.gov](mailto:middleton.keith@epa.gov).

Sincerely,



 Tinka G. Hyde  
Director, Water Division

Enclosure

cc: David Kitzmiller, Village of Godfrey, w/enclosure (copy)  
Roger Callaway, Illinois Environmental Protection Agency, w/enclosure



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

<b>IN THE MATTER OF:</b>	)	Docket No. V-W-14-308-22
	)	
Village of Godfrey, Illinois	)	
	)	Proceeding under Section 308(a) of
	)	the Clean Water Act, as amended,
	)	33 U.S.C. § 1318(a)
NPDES Permit No. IL0036421	)	

**INFORMATION REQUEST**

**I. STATUTORY AUTHORITY**

The U.S. Environmental Protection Agency is issuing this Information Request to the Village of Godfrey (You) pursuant to the authority vested in the Administrator of EPA by Section 308(a) of the Clean Water Act (CWA), 33 U.S.C. § 1318(a). The Administrator has delegated this authority to the Regional Administrator of EPA, Region 5, who has re-delegated this authority to the Director of the Water Division, EPA Region 5.

**II. INSTRUCTIONS**

1. You must respond to this Information Request within 30 calendar days of its receipt by You. Submission instructions are in Section V of this Information Request.
2. You must respond separately to each of the requests. Where a "yes" or "no" answer is requested, You may provide additional information, if desired. Precede each answer with the number of the request to which it corresponds. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the request to which it corresponds.
3. If You do not have documents responsive to a particular request, state in your written response that You do not have responsive documents.
4. You must keep the reports and all records reviewed or generated in the course of responding to this Information Request until EPA informs You in writing that You are no longer required to keep the reports and records, or for three years, whichever is sooner.



### III. DEFINITIONS

1. "Alton's Sewage Treatment Plant" or "Alton's STP" for the purposes of this request shall mean the wastewater treatment plant(s) operated by the City of Alton, National Pollutant Discharge Elimination System (NPDES) Permit Number IL0027464, and located at 19 Chesson Lane, Alton, Illinois and all components of such sewage treatment plant(s).
2. "Backup" or "Building/Property Backup" means, for the purposes of this request shall, wastewater backups into buildings that are caused by blockages or flow conditions occurring in the sanitary sewer collection system owned and/or operated by the Village of Godfrey, Illinois.
3. "Blockage" shall mean the partial or complete interruption of flow as a result of some obstruction in any portion of the Sanitary Sewer System.
4. "Bypass," as defined by 40 C.F.R. § 122.41(m), shall mean the intentional diversion of waste streams from any portion of a treatment facility.
5. "Collection System" shall mean all portions of your sewer system that collect and convey sanitary and/or combined sewage for treatment to either the City of Alton Sewage Treatment Plant (STP) or the Village of Godfrey Sewage Treatment Plant (STP). The Collection System, for purposes of this Information Request, does not refer to a separate storm sewer system.
6. "Combined Sewer System(s)" shall mean all portions of your sewer system designed to convey municipal sewage (domestic, commercial, and industrial wastewater) and stormwater through a single-pipe system to the wastewater treatment plant or to combined sewer outfalls.
7. "Day" or "days" shall mean a calendar day or calendar days. In computing any period of time under this Information Request, where the last day would fall on a Saturday, Sunday, or federal or state holiday, the period shall run until the close of the next business day.
8. "Force Main" shall mean any pipe that carries wastewater under pressure from the discharge side of a pump to a point of gravity flow downstream.
9. "Godfrey's Sewage Treatment Plant" or "Godfrey's STP" for the purposes of this request shall mean the wastewater treatment plant(s) operated by the Village of Godfrey, National Pollutant Discharge Elimination System (NPDES) Permit Number IL0036421, and located at 4725 Brecht Lane, Godfrey, Illinois and all components of such sewage treatment plant(s).
10. "Gravity Sewer" shall mean a pipe that receives, contains, and conveys wastewater that is not normally under pressure and is intended to flow unassisted under the influence of gravity.
11. "Infiltration" shall mean water, other than wastewater, that enters your Sanitary Sewer System (including sewer service connections) from the ground through such means as defective pipes, pipe joints, connections, or manholes.



12. "Inflow" shall mean water, other than wastewater, that enters your Sanitary Sewer System from sources such as, but not limited to, roof leaders, cellar drains, yard drains, area drains, foundation drains, drains from springs and swampy areas, manhole covers, cross connections between storm sewers and sanitary sewers, catch basins, cooling towers, stormwater, surface runoff, street wash waters, or drainage.
13. "I/T" shall mean the total quantity of water from Infiltration and Inflow without distinguishing the source.
14. "Private Lateral" shall mean that portion of the Sanitary Sewer System(s), not owned by You, used to convey wastewater from a building or buildings to that portion of the Sanitary Sewer System(s) owned by You.
15. "Pump Station" shall mean facilities comprised of pumps or other equipment that lift wastewater to a higher hydraulic elevation, including all related electrical, mechanical, and structural systems necessary to the operation of that pumping station.
16. "Record" or "records" shall mean any recording of information in tangible form. It includes, but is not limited to, documents, memoranda, reports, letters, maps, graphs, charts, log books, notes, emails, computer files, computer printouts, and computer databases.
17. "Sanitary Sewer Overflow" or "SSO" shall mean an overflow, spill, diversion, or release of wastewater from or caused by your Sanitary Sewer System(s). This term shall include: (i) discharges to waters of the United States from the Sanitary Sewer System(s); and (ii) any release of wastewater from the Sanitary Sewer System(s) to public or private property that does not reach waters of the United States, including Backups.
18. "Sanitary Sewer System(s)" shall mean all portions of your sewer system (including all pipes, Force Mains, Gravity Sewer segments, overflow structures, regulators, Pump Stations, manholes, and components thereof), designed and constructed to collect and convey only sewage, and not storm water, from residences, commercial buildings, industrial plants, and institutions for treatment at either City of Alton STP or the Village of Godfrey STP.
19. "Satellite Sewer System" shall mean a sewer Collection System that collects wastewaters from a legal entity other than You and delivers these wastewaters to your receiving sewer(s) or interceptor(s). Legal entities can include unincorporated areas. The Satellite Sewer System often, but not always, depends on a downstream authority for the treatment of these transferred wastewaters.
20. "You" for purposes of this Information Request refers to the Village of Godfrey and to any agents, employees, contractors, or other entities that performed work or acted in any way on behalf of, or at the direction of, Village of Godfrey.



#### IV. REQUESTS

Collection System/Service Area (please only include information on the sewerage tributary to the Village of Godfrey STP)

1. Provide the following information for your Sanitary Sewer System(s):

- a. Service area (in square miles) \_\_\_\_\_
- b. Population served \_\_\_\_\_
- c. System inventory \_\_\_\_\_

Miles of Gravity Sewer	Miles of Force Main	Number of Pump Stations

d. Number of service connections:

Residential \_\_\_\_\_ Commercial \_\_\_\_\_  
 Industrial \_\_\_\_\_ Total \_\_\_\_\_

e. Provide actual flows experienced for the previous 12 months expressed in million gallons per day (MGD). Cite the source or calculation method from which You obtained these values (e.g., flow meters, billing statements, etc.).

	Average Daily Wastewater Flow (MGD)	Source (or calculation method) of Average Daily Wastewater Flow Values	Average Daily Water Consumption (MGD)	Source (or calculation method) of Average Daily Water Consumption Values
Residential				
Commercial				
Industrial				
Other				
Total				

f. Minimum wastewater flow experienced in a 24 hour period for the previous 12 months expressed in MGD: \_\_\_\_\_

g. Is any of the Collection System tributary to the Godfrey STP a Combined Sewer System?  
 Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, what percent of the Collection System tributary to the Godfrey STP is combined?  
 \_\_\_\_\_



- h. Provide infrastructure age distribution estimates for the tributary to the Godfrey STP Collection System.

Age	Gravity Sewer, miles	Force Mains, miles or feet	Number of Pump Stations
0 - 25 years			
26 - 50 years			
51 - 75 years			
> 76 years			

- i. Provide pipe size distribution estimates for the Collection System tributary to the Godfrey STP.

Diameter in inches	Gravity Sewer, miles	Force Mains, miles or feet
8 inches or less		
9 - 18 inches		
19 - 36 inches		
> 36 inches		

2. Indicate or describe a property owner's responsibility for maintenance and repair of Private Laterals (check one):

- a. At main line connection only
- b. From main line to property line or easement/cleanout
- c. Beyond property line/cleanout
- d. Other

Explain \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

3. Describe any atypical local conditions that may increase the complexity or difficulty of the design, construction, operation, and maintenance of the Collection System tributary to the Godfrey STP.

4. Identify whether You do the following to determine if the capacity of the existing Sanitary Sewer System(s) is adequate for new connections.

- a. Is flow metering performed prior to allowing new connections?

Yes \_\_\_\_ No \_\_\_\_

- b. Do You use a hydraulic model of the Sanitary Sewer System(s) to predict the effects of new connections?

Yes \_\_\_\_ No \_\_\_\_



- c. Do You require written certification by a licensed professional engineer indicating that the Sanitary Sewer System(s) has been determined to have adequate capacity to accommodate flow from new connections?

Yes \_\_\_\_\_ No \_\_\_\_\_

5. Are there portions of the Collection System service areas tributary to the Village of Godfrey STP that have experienced street flooding, with sewage as a component, in the past five years?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, describe and list all areas that experience chronic street flooding.

**Force Mains (please only include information on the sewerage tributary to the Village of Godfrey STP)**

6. Identify the total number of Force Main failures that have occurred in the last five years.

\_\_\_\_\_

7. Provide a description of the cause(s) of each Force Main failure that has occurred in the last five years.

**Pump Stations (please only include information on the sewerage tributary to the Village of Godfrey STP)**

8. Provide the following information related to Pump Stations in your Collection System tributary to the Godfrey STP:

- a. Total number of Pump Stations in the Collection System tributary to the Godfrey STP

\_\_\_\_\_

- b. Number of Pump Stations with on-site pump capacity redundancy

\_\_\_\_\_

- c. Number of Pump Stations with dry weather capacity limitations

\_\_\_\_\_

- d. Number of Pump Stations with wet weather capacity limitations

\_\_\_\_\_

- e. Number of Pump Station failures resulting in SSOs, or Backups, in the last five years

\_\_\_\_\_

- f. Number of Pump Stations fed with electrical power from at least two independent electrical power grid feeds

\_\_\_\_\_

- g. Number of Pump Stations with permanently installed backup power generators onsite that automatically activate when supplied power is interrupted

\_\_\_\_\_



- h. Number of Pump Stations with backup power capability, but only with portable generators to be brought to the Pump Station site from other locations \_\_\_\_\_
- i. Number of Pump Stations with "pump around" capability (i.e., where Pump Station wet well can be evacuated and pumped with portable pump to nearby downstream Sanitary Sewer System manhole) \_\_\_\_\_
- j. Number of Pump Stations where conditions are monitored remotely and that trigger an alarm at a central monitoring location (e.g., at the Godfrey STP or central public works center) \_\_\_\_\_

**Sanitary Sewer Overflows (Please carefully read the instructions and make sure that the data provided is clearly distinguished between SSOs occurring in the Alton-tributary portion of the Collection System and SSOs occurring in the Godfrey-tributary portion of the Collection System)**

9. Describe each SSO that has occurred in the entire Collection System within since 2009. Include the following information for each SSO (create a supplemental table as necessary to list the data below):
  - a. Date of the SSO
  - b. Location of the SSO
  - c. Estimated volume of the SSO (in gallons or million gallons (MG))
  - d. Cause of the SSO
  - e. Whether the SSO occurred in sewerage tributary to Alton STP or Godfrey STP
  - f. How You determined that the SSO occurred
  - g. Depth of precipitation (in inches) received (if any) contributing to the SSO
  - h. Peak STP flow (in MGD) on the day that the SSO occurred
  - i. Disposition of the SSO (i.e., did the release reach a waterway, flow to storm sewer, paved areas, etc.)
  - j. Actions taken to mitigate the SSO
  - k. Whether or not You reported the SSO to the state environmental agency
  - l. How soon after the SSO You reported it
  - m. Whether any samples of the SSO discharge were collected and analyzed
  
10. Identify the number of SSOs that originated from each of the following sources since 2009 occurring in sewerage that was tributary to Alton STP:
  - a. Manholes \_\_\_\_\_
  - b. Pump Stations \_\_\_\_\_
  - c. Main and trunk sewers \_\_\_\_\_
  - d. Lateral and branch sewers \_\_\_\_\_
  - e. Structural Bypasses or relief points \_\_\_\_\_
  - f. Force Mains \_\_\_\_\_
  - g. Other, explain: \_\_\_\_\_



11. Identify the number of SSOs that originated from each of the following sources since 2009 occurring in sewerage that was tributary to Godfrey STP:
- a. Manholes \_\_\_\_\_
  - b. Pump Stations \_\_\_\_\_
  - c. Main and trunk sewers \_\_\_\_\_
  - d. Lateral and branch sewers \_\_\_\_\_
  - e. Structural Bypasses or relief points \_\_\_\_\_
  - f. Force Mains \_\_\_\_\_
  - g. Other, explain: \_\_\_\_\_
12. Identify the volume of SSOs expressed in gallons or MG from each of the following sources since 2009 occurring in sewerage that was tributary to Alton STP:
- a. Pump Stations \_\_\_\_\_
  - b. Force Mains \_\_\_\_\_
  - c. Manholes \_\_\_\_\_
  - d. Other, explain: \_\_\_\_\_
13. Identify the volume of SSOs expressed in gallons or MG from each of the following sources since 2009 occurring in sewerage that was tributary to Godfrey STP:
- a. Pump Stations \_\_\_\_\_
  - b. Force Mains \_\_\_\_\_
  - c. Manholes \_\_\_\_\_
  - d. Other, explain: \_\_\_\_\_
14. Identify the number of SSOs since 2009 occurring in sewerage that was tributary to Alton STP :
- a. Debris buildup \_\_\_\_\_
  - b. Collapsed pipe \_\_\_\_\_
  - c. Root intrusion \_\_\_\_\_
  - d. Capacity limitations \_\_\_\_\_
  - e. Excessive I/I \_\_\_\_\_
  - f. Fats, oil, and grease \_\_\_\_\_
  - g. Vandalism \_\_\_\_\_
  - h. Power interruption and/or lack of backup power source \_\_\_\_\_
  - i. Mechanical or electronic failure \_\_\_\_\_
  - j. Pump failure and/or lack of backup (or duplex) pumps \_\_\_\_\_
  - k. Other, explain: \_\_\_\_\_
15. Identify the number of SSOs since 2009 occurring in sewerage that was tributary to Godfrey STP:
- a. Debris buildup \_\_\_\_\_



- b. Collapsed pipe \_\_\_\_\_
- c. Root intrusion \_\_\_\_\_
- d. Capacity limitations \_\_\_\_\_
- e. Excessive I/I \_\_\_\_\_
- f. Fats, oil, and grease \_\_\_\_\_
- g. Vandalism \_\_\_\_\_
- h. Power interruption and/or lack of backup power source \_\_\_\_\_
- i. Mechanical or electronic failure \_\_\_\_\_
- j. Pump failure and/or lack of backup (or duplex) pumps \_\_\_\_\_
- k. Other, explain: \_\_\_\_\_

16. For the SSOs to waterways that are identified in response to Questions 12 and 13, how many were to surface waters that could affect:

- a. Primary contact recreation (swimming, bathing, waterskiing, etc.) \_\_\_\_\_
- b. Shellfish growing areas \_\_\_\_\_
- c. Drinking water sources \_\_\_\_\_

17. Please include a copy of your current emergency response procedures for SSOs.

**Backups (Please carefully read the instructions and make sure that the information provided is clearly distinguished between Backups occurring in the Alton-tributary portion of the Collection System and Backups occurring in the Godfrey-tributary portion of the Collection System)**

18. Provide a description of each Backup that has occurred within the entire Collection System since 2009. Include the following information for each Backup (create a supplemental table as necessary to list the data below):

- a. Date of the Backup;
- b. Location/Address of the Backup;
- c. Whether the Backup occurred in sewerage tributary to Alton STP or Godfrey STP;
- d. Cause of the Backup;
- e. Weather conditions during the Backup. If excessive rainfall contributed to the Backup, please list the rainfall amount and the duration of the rainfall event(s);
- f. Methods used to remove the Backup water from the property and disposition of Backup water (i.e., was the property owner's accumulated Backup pumped out of the residence to a street storm sewer drain; relieved to a sanitary cleanout or sanitary drain; transported to the plant for treatment; vacuumed and hauled away; etc.);
- g. Actions taken to mitigate the Backup;
- h. Time to clear or fix the Backup;
- i. Whether or not the Backup was reported to the state environmental agency and how soon after the Backup this was done;
- j. List the measures used to mitigate the environmental harm caused by the Backup water removal, if that water was untreated;
- k. Responsible party (e.g., private property owner or You); and



1. Whether or not a damage claim was filed and dollar value of the claim.
19. Are there portions of the Collection System that is tributary to Godfrey STP that have chronic problems with Backups?  
Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, list and describe each area and the reasons for chronic Backups in that area.

Blockages (please include information on the sewerage tributary to the Godfrey STP)

20. Provide the following information related to Blockages that have occurred in your Collection System that is tributary to Godfrey STP in each year for the last five years:
  - a. Number of Blockages for each year
  - b. Average time to clear a Blockage (minutes)
  - c. Number of Blockages resulting in SSOs and/or Backups for each year
  - d. Total volume of SSOs (gallons or MG) that resulted from Blockages for each year

Infiltration and Inflow

21. Provide EPA an update on the Village of Godfrey's progress in assessing and eliminating excessive I/I, especially in the areas where the two flow monitors were utilized.

Operation and Maintenance

22. Please include a copy of your most recently implemented Capacity, Management, Operation, and Maintenance (CMOM) program.
23. Has Godfrey's CMOM program been approved by the Illinois Environmental Protection Agency?  
Yes \_\_\_\_\_ No \_\_\_\_\_
24. Please list the locations of the two areas the Village of Godfrey have targeted where I/I is considered heavy or excessive.

Wastewater User and Customer Complaints

25. Provide the following information related to Sanitary Sewer System user complaints:
  - a. Number of user complaints received each year since 2009 for sewerage tributary to Godfrey STP
  - b. Number of user complaints received each year since 2009 that were your responsibility for sewerage tributary to Godfrey STP
  - c. Number of claims received and damages paid each year for the last five years for sewerage tributary to Godfrey STP



## V. SUBMITTALS

1. Please submit your response to this Information Request within 30 days of your receipt of the Information Request to:

Water Enforcement and Compliance Assurance Branch (WC-15J)  
U.S. Environmental Protection Agency, Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
Attention: Keith Middleton, Environmental Engineer

2. You must submit all requested information under an authorized signature with the following certification:

I certify under penalty of law that this response and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system, or those person(s) directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment for knowing violations.

3. If You find at any time after submitting information to EPA that any portion of the submittal is false or incorrect, You must notify EPA immediately. Knowing submittal of false information to EPA in response to this Information Request may subject You to criminal prosecution under Section 309(c) of the CWA, 33 U.S.C. § 1319(c), and 18 U.S.C. §§ 1001 and 1341.
4. You may not withhold information because You claim it is confidential. However, pursuant to 40 C.F.R. Part 2, Subpart B, You may assert a claim of business confidentiality regarding any portion of the information submitted in response to this Information Request, as provided in 40 C.F.R. § 2.302(a)(2). The regulations provide that a person may assert a business confidentiality claim covering part or all of the information furnished to EPA when that person submits the information. The manner of asserting such claims is specified in 40 C.F.R. § 2.203(b). Effluent data (as defined in 40 C.F.R. § 2.302(A)(2)) and information in NPDES permit applications is not entitled to confidential treatment. 40 C.F.R. § 122.7. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth in 40 C.F.R. Part 2, Subpart B. If You do not assert a claim of business confidentiality when You submit the information, EPA may make the information available to the public without further notice.
5. This Information Request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.



6. EPA may use the information submitted in response to this Information Request in an administrative, civil or criminal action.
7. Neither the issuance of this Information Request by EPA nor your compliance with this Information Request relieves You of liability for any penalty, fine, remedy or sanction authorized to be imposed pursuant to Section 309(b), (c), (d), or (g) of the CWA, 33 U.S.C. § 1319(b), (c), (d), or (g), including but not limited to those related to any violations addressed by this Information Request. EPA specifically reserves the right to seek any of the remedies specified in Section 309(b), (c), (d), or (g) of the CWA, 33 U.S.C. § 1319(b), (c), (d), or (g).
8. There can be significant civil or criminal penalties for failing to adequately respond to requests for information issued under the Section 308(a) of the CWA, 33 U.S.C. § 1318(a).
9. Please contact Keith Middleton of my staff by telephone at (312) 886-6465, or via email at [middleton.keith@epa.gov](mailto:middleton.keith@epa.gov), if You have any questions about this Information Request



  
Tinka G. Hyde  
Director, Water Division  
U.S. Environmental Protection Agency, Region 5

7/24/14  
Date